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May 19, 2006

Susan Driscoll Bourque
Case Manager
U.S. District Court
For the Western District of Michigan
602 Federal Courthouse
Grand Rapids, Michigan 49503-2363

Great Lakes Exploration, etc. v. The Unidentified, etc., Case No.1:04-CV-375

Dear Ms. Bourque:

I am in receipt of Mr. Piggush's status letter dated May 18, 2006. It appears that Mr. Piggush may have inadvertently forgotten the protocol to which the parties agreed three months ago; that protocol is set forth in my letter to the Court dated February 13, 2006. (A copy of the letter is attached).¹

In the February 13, 2006 letter, the parties stated:

The parties will continue to rely upon the abeyance entry while they pursue their discussions, and they would appreciate notice and an opportunity to be heard on any matters pertaining to the Court's entry.

In the event that the current discussions are not successful, Plaintiff would plan to file a memorandum in opposition to the pending motion, and the Intervenors would then file a reply.

Letter dated 2/13/06 at 1.

After so much work and progress among the parties, it would be disappointing to my client if the Court were to determine that this is not a matter appropriate for the Court's nationally-renown alternative dispute resolution program. Still, I respect the Court's wisdom on how to proceed. In the event that the Court decides that this matter is not appropriate for mediation, I respectfully request (1) notice to that effect and (2) a

¹ As noted in the body of the letter, the February 11 letter was "written on behalf of counsel for Plaintiff and for Intervenors."

Letter to Susan Driscoll Bourque
May 19, 2006
Page 2

specific date certain for Plaintiff to file its memorandum in opposition to Defendant's motion.

Respectfully,
ROBOL LAW OFFICE, LPA

By: /s/ Richard T. Robol
Richard T. Robol

RTR/cr

Cc: James R. Piggush, Esq.
Roger W. Boer, Esq.